

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

PETER BALDSCHUN, Individually, and as §
Surviving Spouse and Administrator of the §
Estate of MALLORY PYLES BALDSCHUN §
Deceased, and as Natural Guardian and §
Next Friend of O.B., H.B., and E.B Minor §
Children; and PETER BALDSCHUN, §
Individually and as Natural Guardian and §
Next Friend of H.B., a Minor Child §

Plaintiff, §

vs. §

ACTION RESOURCES, LLC., §
CABB NORTH AMERICAN, INC., AND §
JAMES ANDREW WILSON II §

Defendants. §

CIVIL ACTION NO. 4:19-CV-83

DEFENDANTS ACTION RESOURCES, LLC AND
JAMES ANDREW WILSON II'S JOINDER TO DEFENDANT
CABB NORTH AMERICA, INC.'S NOTICE OF REMOVAL

Defendants **ACTION RESOURCES, LLC** (hereinafter "Action Resources") and **JAMES ANDREW WILSON II** hereby file the within Joinder to Defendant CABB North America, Inc.'s Notice of Removal in the above-styled and numbered cause, and in support thereof state as follows:

I. JOINDER

Action Resources and James Andrew Wilson II hereby join Defendant CABB North America, Inc.'s ("CABB") Notice of Removal (Document 1) and incorporates all of the allegations set forth in CABB's Notice of Removal as though the same were set forth at length herein.

II. PRAYER

WHEREFORE, Defendants **ACTION RESOURCES, LLC** and **JAMES ANDREW WILSON II** respectfully pray and request that further proceedings in the lawsuit pending in the 164th Judicial District Court of Harris County, Texas at Cause No. 2018-88966 be discontinued, that Cause No. 2018-88966 be removed to federal court, that a federal court assume full jurisdiction over this action as provided by law, and that a federal court grant Action Resources, LLC all other relief, at law or in equity, to which these Defendants may be justly entitled.

Respectfully Submitted,

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ATTORNEYS FOR DEFENDANTS
**ACTION RESOURCES, LLC and
JAMES ANDREW WILSON II**

CERTIFICATE OF SERVICE

I do hereby certify that on the 22nd day of January, 2019, the Court using the CM/ECF system which will send notification of such filing to the following:

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